

## VER-0266 Response Plan for Bullying, Gender-Based Harassment, Sexual Harassment, and Violence

Please note that the following procedure is an AI generated translation of the original document, [Viðbragðsáætlun við einelti, kynbundinni áreitni, kynferðislegri áreitni og ofbeldi](#). If the content of the these documents conflicts the original text applies.

# Response Plan for Bullying, Gender-Based Harassment, Sexual Harassment, and Violence

### Introduction

The Act on Working Environment, Health and Safety in Workplaces (46/1980) aims to ensure a safe and healthy working environment. The Regulation on Measures Against Bullying, Sexual Harassment, Gender-Based Harassment, and Violence in Workplaces, no. 1009/2015, is established based on this Act. The regulation applies to measures against bullying, sexual harassment, gender-based harassment, and violence in workplaces and elaborates on the provisions of Act no. 46/1980 in more detail.

Equality and respect should prevail in all interactions at the Iceland University of the Arts (IUA). Freedom of expression is respected, and discussions are conducted in a professional and responsible manner. Staff and students strive for reliable work practices and show care and respect for each other's work and time.

Bullying or other harassment will not be tolerated under any circumstances. Gender-based and sexual harassment and violence are strictly prohibited by staff and students of the IUA and are unequivocally banned in all University activities. Harassment and violence will neither be silenced nor tolerated under any circumstances.

All reports and complaints of bullying, sexual harassment, gender-based harassment, and violence must be taken seriously and processed according to IUA's response plan.

### Objective

The objective of this plan is to ensure that resources are available for individuals who believe they have been subjected to bullying, gender-based harassment, sexual harassment, or violence. This response plan outlines the procedures and processes that ensure IUA responds promptly to notifications.

Bullying, gender-based harassment, sexual harassment, and violence are not tolerated in interactions between staff and students, among staff or students themselves, nor in interactions between staff or students and individuals outside the IUA, provided the interactions are related to IUA's activities.

### Definitions

The following definitions are according to Regulation No. 1009/2015:

**Bullying:** Repeated behavior that generally causes discomfort to the person subjected to it, such as belittling, insulting, hurting, or threatening the individual or causing them fear. Disagreements or conflicts of interest do not fall under this category.

---

#### Upplýsingar um skjalið

Tegund:	Verkferill
Útg.d:	6.2.2025
Útgáfa:	3.0
Áb.maður:	Mannauðsstjóri
Endurskoðun:	[Endurskoðunardagsetning]

Examples of manifestations of bullying:

- Repeated unreasonable criticism
- Humiliation
- Gossip or rumors
- Deliberate exclusion
- Silencing
- Withholding information deliberately
- Vandalism
- Unrealistic supervision
- Lack of tolerance towards individual differences (Vinnueftirlit, 2021)

*Gender-Based Harassment:* Behavior related to the gender of the person subjected to it, intended to or resulting in offending the individual's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment.

*Sexual Harassment:* Any sexual behavior intended to or resulting in offending the dignity of the person subjected to it, especially when the behavior leads to an intimidating, hostile, degrading, humiliating, or offensive environment. The behavior can be verbal, symbolic, and/or physical.

*Violence:* Any behavior that results in or could result in physical or psychological harm or suffering to the person subjected to it, including threats of such, coercion, or arbitrary deprivation of liberty.

### **Response Team**

The Management Council appoints members of IUA's response team and can request information about their work. The team should strive for gender balance. If there is doubt about the eligibility of team members in specific cases, the concerned individual should step aside, and another person should be appointed in their place. Administrative law regarding eligibility should be followed, particularly considering the eligibility of the parties involved in the case. Team members are obliged to maintain confidentiality about all matters brought to them as much as possible.

The response team includes two external experts with knowledge and experience in handling such cases. Reports are submitted [here](#) and received by IUA's Director of Human Resources, who follows up on cases and generally attends response team meetings.

### **Notifications / Scope**

If someone believes that an IUA employee or student has bullied them, subjected them to violence, gender-based harassment, or sexual harassment, they are strongly encouraged to report it to IUA's Director of Human Resources. If an IUA employee or student has a justified suspicion or knowledge of behavior that could be considered bullying, gender-based harassment, sexual harassment, or violence against another IUA employee or student, they should report the violation to the aforementioned individual. This also applies to behavior related to interactions between IUA employees or students and individuals not considered employees or students of the University, provided the interactions are related to the University's activities.

---

#### **Upplýsingar um skjalið**

Tegund:	Verkferill
Útg.d:	6.2.2025
Útgáfa:	3.0
Áb.maður:	Mannauðsstjóri
Endurskoðun:	[Endurskoðunardagsetning]

## Procedure

The response team should investigate cases brought to them, ensure equality and proportionality, and deliver a conclusion as soon as possible. Actions taken during the case process are generally in consultation with the individual against whom the alleged violation is directed (alleged victim). Confidentiality is maintained about what is discussed in interviews as much as possible. The response team seeks the consent of their interviewees if it is deemed necessary to share information disclosed in interviews for case processing.

Upon notification, the response team should invite the person reporting suspicion of bullying, gender-based harassment, sexual harassment, or violence to a meeting. If the notification comes from someone other than the person against whom the violation is directed, the team should invite the individual believed to have been subjected to bullying, sexual harassment, gender-based harassment, or violence (alleged victim) to a meeting and assess their stance on the notification.

### **A – Initial Steps Following Notification and Informal Procedure**

If an IUA employee or student believes they have been subjected to behavior they consider bullying (or bullying attempts), gender-based harassment, sexual harassment, and/or violence, and the behavior is related to interactions within the University, they can contact IUA's Director of Human Resources and request an interview with a member/members of IUA's response team. The purpose of the interview is to provide the student/employee with an opportunity to discuss their experience and receive advice and/or information about possible remedies.

Examples of remedies that can be taken following such a conversation:

- Advice on seeking support/guidance from appropriate professionals.
- A conversation between IUA's response team and the person(s) involved in the communication issue.
- Mediation.
- Initiating formal proceedings, as per section B.

The above remedies are not exhaustive, as each case is unique. The response team always considers the stance of the person seeking the team's assistance regarding the proposed responses. If the notification involves suspicion of criminal behavior, the response team advises that the behavior can be reported to the police.

### **B – Formal Procedure**

Formal procedures should comply with the requirements set out in Regulation no. 1009/2015.

If an IUA student or employee believes they have been subjected to bullying, gender-based harassment, sexual harassment, or violence, they can file a formal complaint and request that the case be processed formally.

The objective of the formal procedure is to determine whether the behavior constitutes bullying, gender-based harassment, sexual harassment, or violence, as defined by Regulation no. 1009/2015.

In formal procedures regarding notifications of bullying, the below procedure should be followed:

---

#### **Upplýsingar um skjalið**

Tegund:	Verkferill
Útg.d:	6.2.2025
Útgáfa:	3.0
Áb.maður:	Mannauðsstjóri
Endurskoðun:	[Endurskoðunardagsetning]



1. **Notification is received. Selection of a processing agent.** IUA's response team generally handles formal procedures regarding complaints/notifications of bullying, gender-based harassment, sexual harassment, or violence. However, the team should always consider whether there is a reason to request external parties to handle the procedure. The processing agents are referred to as those handling the formal procedure.
2. **First meeting with the alleged victim.** The alleged victim should be invited to a meeting with the processing agent. Detailed information about the case should be sought from the alleged victim, and they should be invited to submit documents related to the complaint. If the processing agent deems it necessary, the alleged victim should also be invited to name individuals they believe can provide information about the incidents related to the complaint. The alleged victim should be informed about the formal procedure. The processing agent should ensure that the alleged victim is informed that they need to be named to the alleged perpetrators. The alleged victim should also be informed about the handling of documents and the procedure in general. At the first meeting with the alleged victim, their stance on whether there is a need to make changes to work or study conditions during the procedure should be sought. The processing agent should assess the need following the meeting.
3. **Meeting with the Alleged Perpetrator(s)**

A meeting should be held with the alleged perpetrator(s) to seek their stance on the complaint. They should also be given the opportunity to submit documents, and if the processing agent deems it necessary, they should be given the opportunity to name colleagues or students who may be able to provide information about the incidents related to the complaint. The stance of the alleged perpetrator on whether there is a need to make changes to work or study conditions during the procedure should also be sought. The processing agent should assess the need following the meeting.

#### 4. Further Information Gathering

If the processing agent deems it necessary to make changes to work or study conditions during the case processing, the processing agents should inform the relevant IUA managers about this assessment, who will decide whether and what changes will be made. The processing agents should gather further documents and information following meetings with the alleged victim and alleged perpetrator as needed, including meetings with other staff or students as needed to clarify the case .

#### 5. Storage of Documents and Confidentiality

In formal procedures, minutes are taken, documents are collected, and information disclosed

#### 6. Conclusion

The IUA response team or, as applicable, another processing entity reaches a conclusion based on the available data and information presented during the procedure regarding whether bullying, gender-based harassment, sexual harassment, or violence as defined by regulation no. 1009/2015 has occurred.

#### 7. Response to the Conclusion

Once a conclusion is reached, the IUA response team must always assess the need to review the school's response plans, enhance education within the school, or seek ways to improve communication practices. This applies regardless of whether the conclusion is that bullying, sexual harassment, gender-based harassment, or violence has occurred or not.

When bullying, gender-based harassment, sexual harassment, or violence is confirmed, the response team or, as applicable, another processing entity must present the conclusion to the victim, the perpetrator, and the relevant IUA

---

**Upplýsingar um skjalið**

Tegund:	Verkferill
Útg.d:	6.2.2025
Útgáfa:	3.0
Áb.maður:	Mannauðsstjóri
Endurskoðun:	[Endurskoðunardagsetning]



administrators. The processing entity may recommend specific measures and responses, but the school administrators make the decisions and are responsible for the actions taken.

The victim is generally informed about the measures recommended by the response team, as far as confidentiality allows. In some cases, consultation with the victim about the measures is sought, if applicable.

Examples of measures:

- Solution-oriented approach for the victim and perpetrator, e.g., in the form of interviews.
- General education and discussion about communication.
- Reconciliation meetings with the assistance of a third party.
- Formal warning or, in exceptional cases, immediate dismissal without notice.

When the conclusion is that bullying, gender-based harassment, sexual harassment, or violence has not occurred, the need to take measures to improve the communication of those involved in the complaint and/or the need for further support for those involved must be assessed.

## **8. Follow-up**

All cases that undergo formal procedures are followed up with conversations with the parties involved to assess whether the measures taken have been effective. If the conclusion is that the measures have not been appropriately effective, efforts should be made to improve the situation and review the chosen measures.

**Please note that the following procedure is an AI generated translation of the original document, [Viðbragðsáætlun við einelti, kynbundinni áreitni, kynferðislegri áreitni og ofbeldi](#). If the content of the these documents conflicts the original text applies.**

---

### **Upplýsingar um skjalið**

Tegund:	Verkferill
Útg.d:	6.2.2025
Útgáfa:	3.0
Áb.maður:	Mannauðsstjóri
Endurskoðun:	[Endurskoðunardagsetning]